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19 *Attorneys for Defendants*

20 CENTRIPETAL NETWORKS, LLC, STEVEN  
ROGERS AND JONATHAN ROGERS

21 **IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

22 ALBERT RICHARDS,

23 Plaintiff,

24 v.

25 CENTRIPETAL NETWORKS, LLC f/k/a  
CENTRIPETAL NETWORKS, INC.;  
26 STEVEN ROGERS; JONATHAN  
ROGERS; and JOHN DOES 1-10,

27 Defendants.

28 Case No. 4:23-cv-00145-HSG

**STIPULATION TO EXTEND DEADLINE  
TO FILE DISCOVERY MOTION; ORDER**

Local Civ. R. 6-1, 6-2, 7-12

Judge: Hon. Haywood S. Gilliam, Jr.

1 Pursuant to Civil Local Rules 6-1, 6-2 and 7-12, the Parties hereby stipulate to and request  
2 that the Court extend the current deadline for Plaintiff Albert Richards (“Plaintiff”) to move to  
3 compel further responses and/or production of documents in response to discovery requests served  
4 on Defendant Centripetal Networks, LLC (“Defendant”).

5 **RECITALS**

6 WHEREAS, on May 14, 2024, Plaintiff served his first set of requests for production and  
7 first set of interrogatories on Defendant (the “Requests”);

8 WHEREAS, under Local Rule 37-3, “no discovery-related motions may be filed more than  
9 seven days after the discovery cut-off”;

10 WHEREAS, the discovery cutoff in this matter passed on July 22, 2024;

11 WHEREAS, therefore, the deadline to move to compel discovery on the Requests is seven  
12 days after that date, on July 29, 2024;

13 WHEREAS, counsel for Plaintiff sent a meet and confer letter concerning the Requests on  
14 July 9, 2024, to which counsel for Defendant responded on July 19, 2024;

15 WHEREAS, counsel for the Parties conferred via telephone on July 25, 2024;

16 WHEREAS, on July 26, 2024, Court granted Plaintiff’s unopposed administrative motion,  
17 per the Parties’ stipulation, requesting an extension of the motion to compel deadline to August 12,  
18 2024;

19 WHEREAS, the Parties have subsequently continued their meet-and-confer efforts, and  
20 believe there continues to be potential for agreement on outstanding discovery disputes;

21 WHEREAS, the Parties mutually believe that an additional extension of time for meet-and-  
22 confer discussions may yield agreement without the need for judicial intervention, which would  
23 prevent undue costs and preserve judicial resources;

24 WHEREAS, Plaintiff has not as yet produced any documents in response to Defendants’  
25 First Set of Requests for Production of Documents, served on May 10, 2024;

26 WHEREAS, the Parties agree that in the event that they cannot timely resolve any issues  
27 concerning such production, when made, Plaintiff will not oppose the filing of an appropriate  
28 Administrative Motion to Extend Time to File Discovery Motion;

1 WHEREAS, the requested relief will not unduly impact the Court's case schedule; and  
2 WHEREAS, Defendants do not oppose Plaintiff's Administrative Motion to Extend Time to  
3 File Discovery Motion, filed herewith;

4 THEREFORE, the Parties, through their counsel, hereby stipulate and agree to request that  
5 the Court extend the deadline for Plaintiff to bring a discovery motion with regard to the Requests,  
6 to August 26, 2024, to facilitate ongoing meet and confer efforts.

7 **IT IS SO STIPULATED.**

8 Dated: August 8, 2024

9 LEWIS & LLEWELLYN LLP

10 By: */s/ Kenneth M. Walczak*

11 Marc R. Lewis  
12 Kenneth M. Walczak  
13 Peter C. Squeri  
14 Daniel Jordan

15 Attorneys for Plaintiff  
16 ALBERT RICHARDS

17 Dated: August 8, 2024

18 KRAMER LEVIN NAFTALIS & FRANKEL  
19 LLP

20 By: */s/ Jonathan M. Wagner*

21 Jonathan M. Wagner

22 Attorney for Defendants  
23 CENTRIPETAL NETWORKS, LLC,  
24 JONATHAN ROGERS, and STEVEN ROGERS

25 **PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.** The last day for  
26 Plaintiff to file a discovery motion in connection with the Requests shall be August 26, 2024.

27 Date: 8/8/2024



28 Hon. Haywood S. Gilliam, Jr.  
United States District Judge